



Mark David McPherson  
+1 212 813 8869  
mmcpherson@goodwinlaw.com

Goodwin Procter LLP  
The New York Times Building  
620 Eighth Avenue  
New York, NY 10018

goodwinlaw.com  
+1 212 813 8800

February 19, 2025

**VIA ECF**

Hon. Jennifer L. Rochon  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Room 20B  
New York, New York 10007

Re: *Oganesyan et al. v. RetailMeNot, Inc.*, No. 1:25-cv-00783 (JLR)

Dear Judge Rochon:

Pursuant to the Court's Individual Rules of Practice in Civil Cases, we write on behalf of defendant RetailMeNot, Inc. to respectfully request an extension of the deadline to respond to the Complaint. RetailMeNot was served with the Summons and Complaint on January 30, 2025 (ECF No. 9), making its response to the Complaint due on February 20, 2025. Subject to further review of the Complaint, RetailMeNot currently intends to file a motion to dismiss. The Parties have met and conferred and agree to extend the motion to dismiss briefing schedule to allow RetailMeNot additional time to review the Complaint and additional time for Plaintiffs to respond to RetailMeNot's anticipated motion.

The Parties respectfully request that the Court enter the following briefing schedule:

- RetailMeNot will file a motion to dismiss on or before March 28, 2025;
- Plaintiffs will file any opposition to the motion on or before May 9, 2025;
- RetailMeNot will file any reply in further support of the motion on or before May 30, 2025.

This is the first request for an extension or adjournment in this matter.

Respectfully submitted,

/s/ Mark David McPherson

Mark David McPherson

Cc: All counsel of record (*via ECF*)